

# FINDING OF NO SIGNIFICANT IMPACT

## Environmental Assessment for Headquarters/Visitor Contact Facility Saint Croix National Scenic Riverway, Wisconsin

**Agency:** National Park Service, United States Department of Interior

**Background:** The National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508); and National Park Service (NPS) Director's Order-12 and Handbook (Conservation Planning and Environmental Impact Analysis and Decision-Making) direct the NPS to consider the environmental consequences of major proposed actions. The NPS has conducted an environmental assessment (EA) that provides an analysis of the environmental consequences of siting, designing, and constructing a new Headquarters/Visitor Contact Facility for the St. Croix National Scenic Riverway.

### Preferred Alternative

The Preferred Alternative is Alternative C described in the EA. This alternative would involve the construction of a new facility on the property of the existing Riverway Headquarters, which is already impacted by existing structures and pavements. The new facility would be constructed east and north of the existing facility with the exact locations of the building, parking lot, and street system to be determined as the design process proceeds. The existing facility would be demolished subsequent to completion of the new facility. The area between the new facility and the river (including the existing spring and trout pond) would be re-landscaped and undergo site restoration with modifications to existing river access, enhancement of outdoor classroom opportunities with the possible installation of a small (less than 1-acre) constructed wetland, and provision for other recreation such as picnicking.

The new facility would be designed to take advantage of southern exposures for solar heating, and all new construction would allow incorporation of maximum energy efficiencies and other sustainable design features. Both existing and projected space requirements for staff operations, visitor contact, and exhibits/curation would be designed into the new facility. Adjacent residential housing to the east and north of the new facility would require some level of vegetative and/or other buffering.

The Preferred Alternative is also the environmentally preferred alternative when measured against the six criteria listed in Section 101 of NEPA.

Criterion 1 (Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations) is best met by the Preferred Alternative which emphasizes:

- Use of existing NPS lands already disturbed by past activity.
- Minimal disturbance of new areas with relatively undisturbed ecological communities.
- Continuing commitment to the community of St. Croix Falls.
- Potential ecological restoration efforts on existing NPS land.
- Physical proximity to the St. Croix River and the concomitant public educational opportunities provided by this proximity.
- Sustainable development and construction.
- Improved working conditions for NPS staff.

Criterion 2 (Assure for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings) is best met by the Preferred Alternative which emphasizes:

- Restoration and enhancement of the natural elements at the existing headquarters site.
- Construction of an aesthetically pleasing and efficiently operating new facility for staff and visitors.
- Full accessibility to the new facility and surrounding public use area.
- Maintenance of an NPS presence within the City of St. Croix Falls adjacent to neighborhoods and one of the deeper pool sections of the St Croix River adjacent to the hydroelectric dam..
- Continuation of all NPS administrative staff activities at one consolidated location.

Criterion 3 (Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences) is best met by the Preferred Alternative, which emphasizes:

- Confining new construction to the already disturbed existing site thus avoiding degradation of areas with higher ecological values.
- Eliminating the existing potential health threats to NPS staff and visitors posed by high mold levels, inadequate electrical wiring, and other facility deficiencies.
- Maintaining a daily presence at the existing headquarters location thus allowing continuing oversight on the activities of the public at this site within the City of St. Croix Falls and adjacent to the hydroelectric dam and pool.

Criterion 4 (Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice) is best met by the Preferred Alternative which emphasizes:

- Continued proximity to the St Croix River as the primary focus of the NPS mission of natural and cultural resource protection and interpretation.
- Communicating the value of a sense of place and stewardship to the public.
- Improving conditions for the curatorial storage of museum objects that meet NPS standards.
- Restoration of the shoreline at the site of the existing building.

Criterion 5 (Achieve a balance between population and resource use that will permit high standards of living and wide sharing of life's amenities) is best met by the Preferred Alternative which emphasizes:

- Maintaining the new Headquarters/Visitor Contact Facility in an area of regional population growth and near a Riverway "gateway point" heavily used by visitors.
- Improving standards of living in terms of NPS staff working conditions and work space.
- Providing accessibility to physically challenged visitors and staff.
- Making use of existing land space.
- Requiring no extension of utilities or roadways.

Criterion 6 (Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources) is best met by the Preferred Alternative which emphasizes:

- Incorporation of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) principles in new construction and demolition.
- Possible use of supplemental alternative energy sources for facility operations.

## Other Alternatives Considered

Five other alternatives, including the No-Action Alternative were also examined in the EA. The other action alternatives included:

- Alternative B—Remodel the existing facility.
- Alternative D—Construct a new facility at the Indianhead Flowage Site (north of Lion’s Park, St. Croix Falls, WI).
- Alternative E—Construct a new facility at the Heritage Coalition Site (north of Taylors Falls, MN along State Route 95).
- Alternative F—Renovate the existing facility for administrative functions and construct an addition to the existing Polk County Information Center at the intersection of U.S. Highway 8 and State Route 35 to serve visitors.

Alternative B was not selected as the Preferred Alternative since continued use of the existing facility would require expensive structural repairs and would still result in a facility with inadequate administrative, curatorial, and visitor facility space. Additionally, this alternative would require a disruptive and expensive temporary staff relocation during renovation. Alternative D was not selected as the Preferred Alternative largely on the grounds that it would require full site development including substantial clearing of natural vegetation and the extension of utilities to the site. The more out-of-the-way location on the far north end of the City of St. Croix Falls, WI was also viewed as a detriment to efficiently serving visitors as well as sending the wrong message to the public in terms of “greenfield” development versus reuse of an existing community asset. Alternative E presented a number of features precluding it from selection as the Preferred Alternative. The most important of these features was the site’s remoteness from and lack of connectivity to the St. Croix River. Additionally, the suitability of the fill materials used at the site (a former borrow pit) was questionable for building construction, and utilities would need to be extended to the site from the City of Taylors Falls, MN. The bluff along the eastern side the site overlooking the river also presented some visitor safety concerns. Alternative F was not selected as the Preferred Alternative since the same concerns discussed about renovating the existing facility as part of Alternative B would remain. Also, this alternative would split the visitor contact facility function from the administrative facility function resulting in a loss of operational efficiency. The amount of available space for building an addition to the Polk County Information Center was also inadequate as was additional parking that would be required for visitors. Finally, the No-Action Alternative was rejected since this alternative would involve only inefficient stopgap, superficial repairs to serious structural problems at the existing headquarters facility resulting in continued long-term structural deterioration. This alternative would not adequately address the documented serious moisture and mold problems jeopardizing the health of staff and the public in the current facility, and it would not provide needed improvements in office space, storage space, visitor information and education facilities, curatorial space, or accessibility.

## Context and Intensity of the Preferred Alternative

The context of the impacts evaluated involves headquarters/visitor contact facility locational and structural changes with direct and indirect impacts on the physical environment and on long-term operational efficiency.

The intensity or severity of impacts resulting from implementation of the Preferred Alternative are evaluated using the ten (10) criteria listed in 40 CFR 1508.27. Key areas in which impacts were evaluated included: geology and soils, surface water quality, wetlands, vegetation and wildlife, solid and hazardous wastes, visitor experience, aesthetic resources, socioeconomic factors, utilities and energy, transportation, and Riverway operations.

*Criterion 1: Overall significance of the action*

The Preferred Alternative would result in some permanent, moderate impacts to certain resource areas as discussed below under other individual criteria. However, the Preferred Alternative would not have a significant impact on the environmental, cultural, or socioeconomic resources of the St. Croix National Scenic Riverway.

*Criterion 2: Public safety and health*

The Preferred Alternative would improve public safety and health for both NPS staff and visitors by replacing the existing facility with its documented health and safety problems related to moisture, mold, inadequate electrical system, etc. Additionally, visitors would no longer need to access the existing visitor contact facility by means of a long brick walkway, which makes it difficult for physically challenged visitors at any time of year and for all visitors during the winter when ice and snow accumulate on the irregular surface. The new facility would improve both access from outside parking areas and internally with construction meeting criteria of the Architectural Barriers Act of 1968.

*Criterion 3: Wetlands, floodplains, ecologically sensitive areas; threatened or endangered species; scientific, cultural, or historic resources*

The new Headquarters/Visitor Contact Facility parking lot associated with the Preferred Alternative may impact a small portion of a linear wooded drainage and wetland at the northern end of the existing NPS property. However, the impact would be minor and could be mitigated on site as part of restoration work done after demolition of the existing headquarters facility. The Preferred Alternative would not impact floodplains; ecologically sensitive areas; threatened or endangered species or their habitats; or scientific, cultural, or historic resources. Cultural artifacts and other items curated by NPS would benefit from the new facility described as part of the Preferred Alternative. Because the preferred site has been extensively modified, no significant cultural resources are expected to be present. However, an archeological survey will occur prior to construction.

*Criterion 4: The degree to which impacts are likely to be highly controversial*

The Preferred Alternative is not highly controversial as evidenced from public input and agency coordination throughout the environmental assessment development process. The only issue of some discussion with the City of St. Croix Falls regarded vacating parts of Hamilton and Massachusetts Streets where they bisect NPS property. The city engineer commented during the 30-day public comment period for the EA that vacating these streets through NPS property would have a detrimental effect on local traffic and would reduce safety. This potential problem can be avoided or mitigated during discussions with the city and with residents during the design phase of the project. No comments were received from the public who had accessed the Draft EA on the Internet during the 30-day review period.

*Criterion 5: The degree to which the potential impacts are highly uncertain or involve unique or unknown risks*

The Preferred Alternative is a straightforward construction project on largely developed land. Characteristics of the site are well known and present no unknown risks.

*Criterion 6: Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.*

The Preferred Alternative does not establish a precedent for future actions with significant effects since the alternative is basically a stand-alone action at the site of the existing Riverway Headquarters. The construction of the new facility would in no way represent a decision in principle about a future consideration.

*Criterion 7: Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects.*

The City of St. Croix Falls has plans for several future actions within the vicinity of the Headquarters/Visitor Contact Facility site. These include purchasing of six-acres of property north of the NPS site for continued use as a marina, developing a riverfront trail from downtown St. Croix Falls through the NPS site, developing the small wedge-shaped property adjacent to the southern boundary of the NPS site into a small city park, constructing a band shell near the river downtown, and implementing other downtown revitalization projects. None of these possible future actions taken individually or collectively would have a significant cumulative impact.

*Criterion 8: The degree to which an action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.*

The Preferred Alternative would have no impact on historic properties eligible for the National Register of Historic Places or on other known significant scientific, archeological, or cultural resources. A Phase I archaeological survey will be conducted prior to ground disturbance associated with the Preferred Alternative to ensure no archeological resources will be impacted.

*Criterion 9: The degree to which an action may adversely affect an endangered or threatened species or its habitat.*

There are no known terrestrial or aquatic threatened or endangered species inhabiting the existing Headquarters/Visitor Contact Center site. The state-rare false mermaid weed could be impacted by construction at the edge of the wooded area and linear drainage/wetland along the northern boundary of the NPS property.

*Criterion 10: Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.*

The Preferred Alternative would not violate any environmental protection law or regulation. Appropriate consultation, coordination, and permitting actions would be necessary prior to implementing the Preferred Alternative. These actions would include Section 106 consultation under the National Historic Preservation Act, Section 404 and 401 permits under the Clean Water Act, Section 10 permit under the Rivers and Harbors Act, and Wisconsin Administrative Code 500 addressing solid waste management requirements.

## Mitigation

Mitigative measures have been integrated into the project, and will be implemented as part of the project. These mandatory provisions are detailed in the table attached to this document. The NPS will ensure that these measures are accomplished; as necessary, mitigation measures will be included within appropriate contracting documents prepared in association with the project.

## Finding of No Significant Impact and No Impairment

Based on my review of the facts and analysis contained in this environmental assessment, which is incorporated herein, I conclude that the Preferred Alternative for a new Headquarters/Visitor Contact Facility at St. Croix National Scenic Riverway would not have a significant impact either by itself or considering cumulative impacts. Accordingly, the requirements of the National Environmental Policy Act, regulations promulgated by the President's Council on Environmental Quality, and provisions of National Park Service (NPS) Director's Order-12 and Handbook (Conservation Planning and Environmental Impact Analysis and Decision-Making) have been fulfilled. Furthermore, the Preferred Alternative selected for implementation would not impair park resources or values and would not violate the NPS Organic Act. The Preferred Alternative supports the enabling legislation establishing the upper portion of the St Croix River and its major tributary the Namekagon River as wild and scenic rivers under the Wild and Scenic Rivers Act of 1968 (Public Law 90-542) with the intended purpose of preserving the scenic, recreational, geologic, fish and wildlife, historic, cultural, and other values associated with free-flowing rivers and their immediate environments for future generations. An environmental impact statement is not required and will not be prepared for implementation of the Preferred Alternative.

Recommended:

Tom Baerly 12/12/02  
Superintendent Date

Approved:

William W. Schul 12/17/02  
Midwest Regional Director Date

MITIGATIVE ACTIONS	
Resource or Issue Area	Mitigation
Geology and Soils	Site-specific best management practices (BMPs) will be used. These BMPs will possibly include but not be limited to reducing soil disturbance to the maximum extent possible; using silt curtains, straw bales, and temporary detention ponds; and using fast-growing grasses or other vegetation to cover temporarily stockpiled soil. Monitoring and maintenance of all erosion control devices would occur throughout the duration of the proposed project.
Surface Water Quality and Wetlands	Short-term impacts on surface water and wetlands adjacent to any construction activity will be mitigated as indicated above for geology and soils. Long-term impacts on surface water quality and adjacent wetlands will be mitigated through maximum micromanagement of storm water runoff from new facilities. Low-impact development methods that attempt to mimic predevelopment site hydrology will be employed to store, infiltrate, evaporate and detain storm water runoff to the maximum extent possible. Vegetated buffers of 75 to 100 feet will be maintained adjacent to all surface waters including the spring-fed trout pond. Overland sheet flow through grassy swales or, preferably through natural vegetative cover will be maximized in siting and design. Techniques to minimize impervious surfaces will be employed in the design of all new facilities including parking lots and roadways. These techniques include, but are not limited to the use of pervious pavement in parking spaces, and installation of bioretention cells to trap parking lot and rooftop runoff.. Any impacts to the existing linear wetland in the wooded north portion of the NPS property would be mitigated on site through new wetland construction.
Utilities, Energy, and Riverway Operations	Energy-saving construction materials and designs will be incorporated into new building construction. to minimize heating and cooling requirements. Alternative energy sources including active and passive solar heating will be evaluated for incorporation into construction. Leadership in Energy and Environmental Design (LEED) principles will be used in the siting, design, and construction of all new buildings. Low-maintenance landscaping will be incorporated into site design taking into consideration integrated pest management, native plant materials, innovative storm water techniques, sound urban forestry techniques, and water-efficient practices. Lighting of facilities will minimize night sky light pollution using guidelines available from the International Dark Sky Association and other sources.